

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROADGET BUSINESS PTE. LTD., a private limited company organized in the country of Singapore,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, OR UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE
A TO THE COMPLAINT,

Defendants.

Case No.: 1:24-cv-00607

Judge: Hon. Lindsay C. Jenkins

**PLAINTIFF'S STATEMENT REGARDING THE
TEMPORARY RESTRAINING ORDER**

Pursuant to the Order entered March 1, 2024, ECF No. 30, Plaintiff Roadget Business Pte. Ltd. (“Roadget”) submits the following statement regarding next steps as to the requested Temporary Restraining Order:

1. The Court noted that for some Defendants, “it has not been able to view the allegedly infringing products,” because the links in Schedule A went to webpages with a message indicating that the product in question was discontinued. ECF No. 31, at 4–5. To address this issue, Roadget is providing evidence of each Defendant seller’s infringement of its registered copyrights, in the form of screenshot evidence attached as Exhibit 1 to the Declaration of Deepa A. Chari filed with this Statement. This evidence includes evidence of infringement by sellers 2, 4–7, 9, 10, 12, and 14–29—that is, the twenty-four sellers as to whom the TRO has

been continued. For completeness, it also includes similar evidence of infringement by the seven sellers as to whom the TRO has been granted.

2. Contemporaneously, Roadget is submitting to the Court's proposed order inbox a single proposed Temporary Restraining Order which applies to all Defendants enumerated in Schedule A to the Complaint, combining the proposed Orders the Court ordered Roadget to submit for 1) the Defendants as to whom the TRO has been granted and 2) the Defendants as to whom the TRO has been continued.

3. If the Court determines that Roadget's submitted evidence of infringement is sufficient to rule as to all Defendants, Roadget respectfully requests that the Court enter a single Temporary Restraining Order under seal as to all Defendants. Roadget requests this Order remain under seal at least until Roadget has received confirmation that the asset freeze is effective, as well as contact information for Defendants, from third parties. In Roadget's experience, it may take 7–10 days from the time it is able to serve third parties with the TRO for such confirmation to occur.

4. As to the Defendants who have taken down the infringing product listings, Roadget submits that injunctive relief and restraint of assets remain appropriate. These specific listings have been removed, but Roadget has been unable to verify whether these Defendants are currently infringing the Roadget Copyrights in other product listings not included in Schedule A to the Complaint, or in product listings connected to other stores controlled by the same entities. Indeed, the disappearance of particular listings is part of the problem: the same entities (or entities under common control by Defendants) are able to easily disappear and reappear under different names to continue their infringement. Additionally, Roadget is unlikely to be able to obtain the equitable remedy of disgorgement of profits unless an asset freeze is put into place.

Roadget respectfully requests that all Defendants be temporarily enjoined from using the Roadget Copyrights or any reproductions, counterfeit copies, or colorable imitations in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Roadget product or not authorized by Roadget to be sold in connection with the Roadget Copyrights.

5. As permitted by the Order, ECF No. 30, Roadget is filing Exhibit 1 to the attached Declaration of Deepa A. Chari under seal, and contemporaneously filing a public redacted version of that Exhibit.

Dated: March 4, 2024

Respectfully submitted,

/s/ Steven J. Horowitz

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